

EXHIBIT 7

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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| In re Terrorist Attacks on September 11, 2001 | 03 MDL 1570 (GBD) (SN) ECF Case |
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This document relates to:

Ashton, et al. v. Republic of Sudan, et al., Case No. 02-CV-6977 (GBD; SN)

Betru, et al. v. Republic of Sudan, et al., Case No. 20-CV-10615 (GBD; SN)

Clarke, et al. v. Republic of Sudan, et al., Case No. 23-CV-7736 (GBD; SN)

**THE ASHTON, BETRU AND CLARKE PLAINTIFFS' REQUEST FOR ISSUANCE OF
CLERK'S CERTIFICATE OF DEFAULT AGAINST THE REPUBLIC OF THE SUDAN**

Pursuant to Rule 55(a) of the Federal Rules of Civil Procedure and Local Rules 55.1 and 55.2(a) of the United States District Court for the Southern District of New York, the *Ashton, Betru and Clarke* Plaintiffs, by and through their undersigned counsel, request a Clerk's Certificate of Default against defendant the Republic of the Sudan ("Sudan"). Within the accompanying declaration, I affirm that defendant Sudan, the party against whom the judgment is sought:

1. is not a minor, infant or an incompetent person;
2. is not in the military service;
3. was properly served with the Ashton Amended Sudan Complaint ("AASC") when it was filed on November 19, 2020 (ECF No. 6537), and service of the AASC was accepted by Sudan's counsel upon filing; The *Betru* Plaintiffs filed an authorized short form complaint against Sudan adopting the Ashton Amended Sudan Complaint filed on December 12, 2020, ECF No. 6558, *Betru et al v. Republic of Sudan*, 20-cv-10615; and the *Clarke* Plaintiffs filed their short form complaint against Sudan adopting the AASC on August 30, 2023, *Clarke v. Republic of Sudan*, 23-cv-7736 agreeing to be bound by any and all rulings related to the AASC.
4. moved to dismiss the AASC for lack of subject matter jurisdiction, lack of personal jurisdiction, and failure to state a claim (ECF Nos. 6574, 6575), but said motion was denied by the Honorable George B. Daniels on August 10, 2023 (ECF No. 9278);

5. appealed the District Court's ruling to the U.S. Court of Appeals for the Second Circuit, but said appeal was dismissed on September 3, 2024, and the Second Circuit issued its Mandate on September 24, 2024 (ECF No. 10394);

6. was required to file its answer to the AASC within fourteen (14) days after the issuance of the Mandate, pursuant to Fed. R. Civ. P. 12(a)(4)(A); and

7. has failed to appear to answer or otherwise respond to the AASC, and has therefore defaulted in the above captioned action.

Respectfully submitted,

/s/Andrew J. Maloney, Esq.

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